

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

JOSEPH DEBIASI, Individually)
and on Behalf of All Others)
Similarly Situated,)

Plaintiff,)

v.)

CARDINAL PIZZA, LLC,)

Defendant.)

Civil Action File No:
5:22-cv-294-MTT

DECLARATION OF ATTORNEY JOSH SANFORD

Pursuant to 28 U.S.C. § 1746, Josh Sanford declares, subject to the penalties for perjury, as follows:

1. My name is Josh Sanford, and I am over the age of 18 and duly qualified to execute this Declaration and to swear to the accuracy of the facts herein contained.

2. I am an attorney licensed and in good standing in the State of Arkansas. I practice law with the law firm of Sanford Law Firm, PLLC (hereinafter “Sanford Law Firm”), which is located in Little Rock, which I founded in Russellville in 2001. I opened an office in Little Rock in 2009 and now predominantly practice in the Arkansas District Courts, together with a busy Western District of Texas practice.

We have eight offices throughout the U.S., and we have attorneys living and working in five states.

3. I practice law full-time, and I manage the other attorneys in the Sanford Law Firm. *See* “Team,” Sanford Law Firm, <https://www.sanfordlawfirm.com/team/> (last viewed 14 June 2022).

4. Sanford Law Firm has been recognized as being the premier prosecutor of wage theft violation cases in all federal courts across the United States. <https://unicourt.com/blog/us-district-courts-labor-litigation-2020/> (last visited 9 March 2021).

5. In the course of my law practice, I engage in a significant amount of wage and hour litigation—specifically cases arising under the Fair Labor Standards Act (FLSA) and the comparable Arkansas Minimum Wage Act (AMWA). A significant portion of my caseload is in various federal courts around the United States, including trial work in cases arising under Title VII of the Civil Rights Act of 1964, the Equal Pay Act, the FLSA, and the Family and Medical Leave Act.

6. I am licensed to practice law in all state and federal courts in the States of Arkansas, Colorado, and Texas. I am also actively engaged in appellate practice. I have handled cases before almost all county Circuit Courts in the Central and River Valley regions of Arkansas, the United States District Courts for the Eastern and Western Districts of Arkansas, the United States District Courts for the Eastern,

Southern, Northern and Western Districts of Texas, United States District Court for the Northern District of Oklahoma, United States District Court for the Southern District of Ohio, the United States District Court for the District of Colorado, the United States District Court for the Eastern District of Michigan, the District Court of Nebraska, the United States District Court for the District of Oregon, and the Fifth, Sixth and Eighth Circuit Courts of Appeals—as well as several other district courts.

7. There is no group of attorneys within 600 miles of Little Rock who have experience comparable to Sanford Law Firm in wage litigation. Including cases currently being prosecuted throughout the country today, Sanford Law Firm has prosecuted over 1,300 wage cases in federal and state courts and in arbitration proceedings. In 2018, only one firm in the United States initiated more wage violation prosecutions than Sanford Law Firm. In 2020, as noted above, Sanford Law Firm ranked first.

8. In 2005, I was voted “Best Attorney” (tie) in a readers’ poll published by *The Courier* in Russellville, Arkansas. Subsequently, in 2008, I served as the President of the Pope County Bar Association. In addition, I am or have been a member of the American, Arkansas, and Pope County Bar Associations, the Arkansas Trial Lawyers Association, and the National Employment Lawyers Association.

9. I have been lead counsel on numerous wage and hour cases filed in United States District Courts throughout the nation, including the following: *Craig Lyons, et al. v. Con Agra*, 4:12-cv-245-JM (E.D. Ark.) (over 790 plaintiffs); *Keyli Cruthis, et al. v. Visions, et al.*, 4:12-cv-244-KGB (E.D. Ark.); *James Finley v. Universal Pressure Pumping, Inc.*, SA:12-ca-0654-OG (Western District of Texas); *Michael Alexander v. Hahn Appliance Center, Inc.*, 12-CV-257-CVE-TWL (N.D. Okla.); *Chad Lochridge, et al. v. Lindsey Management, et al.*, 5:12-CV-5047-JLH (W.D. Ark.); *Bill Hollomon, et al. v. AT&T Mobility Services, LLC*, 4:11-cv-600-BRW (E.D. Ark.); *Jeffrey Bacon, et al. v. Eaton Aeroquip, LLC*, 2:11-cv-14103-GD (E.D. Mich.); *Karen “Kay” Roland v. Sharp County Post 336, et al.*, 1:11-CV-85-DPM (E.D. Ark.); *Bennie Watson, et al. v. Surf-Frac Wellhead Equipment Company, Inc.*, 4:11-CV-843 (JLH) (E.D. Ark.); *Robert Terry, et al. v. City of Ola*, 4:11-cv-11-645 (JLH) (E.D. Ark.); *Donald Bateman, et al. v. Frac Tech Services, LLC*, 6:11-cv-708 (E.D. Tex.); *Kalie Brown, et al. v. Barney’s Barn, Inc., d/b/a/ Peaches Gentlemen’s Club*, 4:11-cv-224 (SWW) (E.D. Ark.); *Jason Phillips v. Oil Patch Water and Sewer Services, LLC, et al.*, 4:11-cv-776 (JLH) (E.D. Ark.); *David Delock, et al. v. Securitas Security Services USA, et al.*, 4:11-CV-520 (DPM) (E.D. Ark.); *Karen Springs, et al. v. First Student, Inc.*, 4:11-CV-00240 (BSM) (E.D. Ark.); *Teramura v. Walgreen Co.*, 5:12-cv-5244-JLH (W.D. Ark.), and many others.

10. I have also been lead counsel on numerous wage and hour cases that resulted in settlements or judgments in favor of my clients including the following: *Coby Pearce v. Frac Tech Services, LLC*, No. 4:12-cv-651-JLH (E.D. Ark.); *Nicole Collins v. Barney's Barn, Inc., et al.*, No. 4:12-cv-685-SWW (E.D. Ark.); *Joseph Gauthier, et al. v. Trican Well Service, L.P.*, No. 6:13-cv-46-LED (E.D. Tex.); *Jason Roche, et al. v. S-3 Pump Service, Inc.*, No. 5:15-cv-268-XR (W.D. Tex.); *Kristen Whitworth, et al. v. French Quarter Partners, LLC*, No. 6:13-cv-6003-RTD (W.D. Ark.); *Robert Terry v. Yell County Ark.*, No. 4:13-cv-408-SWW (E.D. Ark.); *Jessica Guinn v. D J Trucking*, No. 4:13-cv-559-KGB (E.D. Ark.); *Maria Romero de Lopez, et al. v. Ozark Mountain Poultry, Inc.*, No. 5:13-cv-5272-TLB (W.D. Ark.); *Sean Jordan v. Big E. Foods, Inc.*, No. 4:14-cv-205-BRW (E.D. Ark.); *Patricia Hernandez, et al. v. Simmons Foods, Inc.*, No. 5:14-cv-5159-JLH (W.D. Ark.); *Sean Schneider v. Habitat for Humanity International, Inc.*, No. 5:14-cv-5230-TLB (W.D. Ark.); *Pedro Espinoza v. Car-Son Construction, LLC*, No. 4:14-cv-467-KGB (E.D. Ark.); *Sheila Lyles v. City of Trumann, Ark.*, No. 3:14-cv-210-DPM (E.D. Ark.); and *Kellie McCartney v. Baily and Thompson Tax and Accounting, P.A.*, No. 4:14-cv-561-SWW (E.D. Ark.).

11. I have also been lead counsel on several wage and hour cases in which collective actions have been granted including *Sam Adams v. United Cerebral Palsy of Central Ark., Inc.*, No. 4:16-cv-930-JLH (E.D. Ark.); *James Harris, et al. v.*

Express Courier International, Inc., No. 5:16-cv-5033-TLB (W.D. Ark.); and *Dustin Moore, et al. v. Performance Pressure Pumping Services, LLC*, No. 5:15-cv-432-XR (W.D. Tex.), and dozens of others.

12. Since January of 2015, Sanford Law Firm has filed and prosecuted over 1,100 distinct wage lawsuits throughout Arkansas and Texas. We have also filed cases in Ohio, Kentucky, Tennessee, North Carolina, South Carolina, Florida, Georgia, Alabama, Mississippi, Louisiana, Missouri, and Illinois. Many of these lawsuits are or were group or collective actions, as well as several class actions under Rule 23.

13. Collectively, cases filed by the Sanford Law Firm since 2009 have resulted in far more than \$13,000,000.00 in settlements and judgments for wage and hour violations for more than three thousand clients across the nation.

14. The National Association of Legal Fee Analysis (NALFA) reports, based on a national survey of more than 2,000 litigators, that the average rate for plaintiffs' attorneys engaged in complex litigation in 2020 was \$445.00 per hour. See "NALFA Releases 2020 Average Hourly Rates in Litigation," NALFA, <http://www.thenalfa.org/blog/nalfa-releases-2020-average-hourly-rates-in-litigation/> (last visited 5 April 2021). The hourly rates requested for attorneys, in this case, all fall below the NALFA average with the exception of my hourly rate, which is slightly higher than the NALFA average but is consistent with my qualifications.

15. The rates charged by Sanford Law Firm's attorneys are reasonable. The rates are reflective of the number of years each attorney has practiced, the attorneys' expertise in employment issues such as the FLSA, the contingent nature of an award of fees, and the rates charged by other attorneys specializing in FLSA work. The staff time and hourly rate for the Sanford Law Firm below are likewise reasonable and comparable.

16. Individual billing requested in this case, including the requested hourly rates for each attorney and support staff member, is summarized below:

Billed By	Rate	Time	Value
Courtney Lowery Total	\$220.00	0.50	\$110.00
Josh Sanford Total	\$470.00	4.85	\$2,279.50
Patrick Wilson Total	\$360.00	2.80	\$1,008.00
Stacy Gibson Total	\$290.00	1.80	\$522.00
Vanessa Kinney Total	\$360.00	1.30	\$468.00
Paralegal Total	\$110.00	8.40	\$924.00
Staff Total	\$90.00	2.60	\$234.00
Grand Total		22.25	\$5,545.50

17. Each attorney's hourly rates are supported by their skills and experience, some of which are described more thoroughly below:

- a. Attorney Courtney Lowery graduated from Arizona State University, Magna Cum Laude, in 2012 with a B.A. in English Literature. After the Air Force stationed her husband in Arkansas, she attended William H. Bowen School of Law, during which she served on the Law Review

Editorial Board and was a member of the Student Animal Legal Defense Fund as well as the student chapter of the Arkansas Association of Women Lawyers. She graduated in 2019, Magna Cum Laude, and began working at Sanford Law Firm as an employment lawyer with a focus on the Fair Labor Standards Act.

- b. Attorney Patrick Wilson graduated from the Jacob D. Fuchsberg Law Center, Long Island, NY in 2006. Mr. Wilson is a member of the New York Bar since 2007 and the Arkansas Bar since 2021. For fourteen years, Mr. Wilson worked with Staff Counsel for Allstate Insurance Company as a Senior Trial Attorney before moving to Arkansas and joining the Sanford Law Firm. As a Trial Attorney, Mr. Wilson litigated numerous personal injury, property damage and subrogation cases, conducted arbitrations and mediations
- c. Attorney Stacy Gibson graduated cum laude from the University of Arkansas School of Law in 2014. While attending law school, Ms. Gibson was a Note and Comment Editor for the Journal of Food Law & Policy. Ms. Gibson litigated family law, probate, and general civil matters throughout the state before focusing her practice on FLSA cases. She has served as co-counsel on numerous single-plaintiff and collective action FLSA cases in Arkansas district courts and in arbitration, as well as served as lead counsel in a collective action for a group of 189 plaintiffs in the Southern District of Mississippi. She has litigated several FLSA cases for law enforcement officers, including this one. Ms. Gibson is a member of the Arkansas Trial Lawyers Association. Ms. Gibson has worked on hundreds of wage cases.
- d. Attorney Vanessa Kinney is a 2007 high honors graduate of the University of Arkansas at Little Rock, William H. Bowen School of Law, graduating eighth in her class. While attending law school, Ms. Kinney was a member of the University of Arkansas at Little Rock Law Review, and had an article published in the Winter of 2006 issue. While attending Law School, Ms. Kinney served in the Law School's Litigation Clinic under special license to practice law under the supervision of a licensed attorney. Since joining Sanford Law Firm, Ms. Kinney has served as both lead attorney and co-counsel on bench and jury trials in both federal and state courts and currently focuses primarily on briefing issues in FLSA cases. Ms. Kinney focuses her

practice primarily in the area of employment law, particularly the Fair Labor Standards Act and Arkansas Minimum Wage Act. Ms. Kinney's wage and hour experience dates back to 2010, and she has experience in wage and hour cases from the inception of cases to trial, and all the way through the appeals process. Ms. Kinney has worked on hundreds of wage lawsuits and is the primary drafter of briefs and motions that are second to none.

18. The Sanford Law Firm's work focuses on representing workers in employment matters, and its lawyers focus their practices in the area of the FLSA and similar wage-and-hour cases. In the community of attorneys who focus their practice in this area of the law, the Sanford Law Firm has a strong reputation for its quality of work and diligent representation of its clients.

19. The lawyers at the Sanford Law Firm often have opportunities for greater responsibility and experience than many of their peers in the legal community with the same years of experience practicing law. What I mean by this is that because of the management style at the Sanford Law Firm, lesser-experienced attorneys are able to independently manage their own cases with the oversight of more experienced attorneys and are supported by a firm culture of collaboration and accessibility to all Sanford Law Firm attorneys. Lesser-experienced attorneys with Sanford Law Firm find themselves effectively navigating litigation with far more experienced opposing counsel, as well as successfully taking on far more responsibility than many of their peers of equal experience at other law firms.

20. Due to this culture of personal responsibility, conferences between attorneys of differing levels of experience ensure that less experienced attorneys receive the benefits of the skills and knowledge of more experienced attorneys.

21. Sanford Law Firm represented Plaintiff in this case on a contingency basis and paid all out-of-pocket costs, including filing and service fees, copying costs, and other such expenses without any assurances that fees or costs would be recovered. The “contingency” fee award sought by Sanford Law Firm is not a contingency fee in the traditional sense whereby an attorney takes a portion of the plaintiff’s recovery. Rather, Sanford Law Firm relies on the fee-shifting provisions of the FLSA and AMWA to recover their fees in this case.

22. Not only is there no guarantee that any fees and costs will be recovered in a contingency fee case, but any recovery made will be delayed as compared to clients who make up-front or monthly payments as litigation proceeds. In contingency fee cases, an attorney is not paid for months or even years, depending on how long it takes for litigation to conclude.

23. This type of work is time-consuming and rigorous, and the amount of time spent by our firm at each step in this case is reasonable. It is not uncommon in the course of my practice for clients with similar cases to incur attorney’s fees that are as much as or more than those in this case.

24. With these matters in mind, I reviewed the hourly rates for the attorneys and staff that the Sanford Law Firm is seeking in this case.

25. Based on my experience and knowledge, it is my opinion that these hourly rates are reasonable given the attorneys' skills, expertise, and reputations, and they are within the range of rates awarded to attorneys with similar backgrounds and experience.

26. The request for attorney's fees and costs is based upon contemporaneous time and expense records maintained by Sanford Law Firm as a matter of ordinary and customary business practice. The time and billing records identify the amount of time expended, the tasks performed, the rate of the particular timekeeper involved, and the costs incurred. A true and accurate copy of a spreadsheet reflecting relevant legal services rendered and time expended on this case through 14 February 2023, is attached hereto as Exhibit A (hereinafter "Billing Spreadsheet").

27. Each task reflected in the attached Billing Spreadsheet was necessary to the successful resolution of this matter; the hours expended were actually expended on the topics stated; the time spent on each task was reasonable; and the rates claimed are also reasonable.

28. Conferences between the attorneys of the Sanford Law Firm, as well as between attorneys and staff of the Sanford Law Firm, are critical to the success of

cases like this one because they improve the efficiency and quality of attorney work. Tasks can be delegated to Sanford Law Firm attorneys who are more experienced in certain types of projects or topics to increase the speed, accuracy or quality for accomplishing the task, or to attorneys whose hourly rates are lower to keep costs down, especially where the speed at which a task can be accomplished will be largely the same regardless of who performs the task. In the case of collective actions, in-house conferences allow attorneys to share the load of multi-plaintiff litigation.

29. Attorney conferences also increase efficiency because they allow attorneys to share their specific legal knowledge of particular topics, thereby preventing an attorney who is working on a project from having to spend time doing the research, creating a new legal form, or otherwise “re-inventing the wheel.” In this way, even less experienced attorneys are able to work more efficiently and with greater quality than other attorneys of comparable experience. In fact, this “communal” knowledge benefits even more experienced attorneys who may be assisted by a less experienced attorney who simply has a particular skill set or knowledge of a topic that can be quickly shared through communication.

30. Because of Sanford Law Firm’s collective knowledge of and experience in FLSA work and use of attorney collaboration, Plaintiff’s counsel was able to complete tasks efficiently, which served to keep billing lower than it would have been without that knowledge, experience, and collaboration.

31. Attorney-client communication is also critical to the success of Sanford Law Firm cases. First, all communication from clients is important. In my experience, when a client feels he or she is being ignored by attorneys, that reduces the level of trust between the client and the attorney, which damages the attorney-client relationship. This, in turn, makes quality representation of the client extremely difficult and reduces efficiency. Further, attorneys must trust that their clients are reliable and accessible. Approaching deadlines, settlement conferences, and other issues in a case often demand immediate client response, so a healthy attorney-client relationship is a necessary part of the litigation process.

32. In order to protect the attorney-client relationship and privilege, entries in the Billing Spreadsheet that reveal the substance of conversations with clients or are otherwise privileged have the substantive portions removed and replaced with the phrase “PRIVILEGED INFORMATION.” However, the replaced language has been preserved and can be produced for in-camera review if this Court believes that such a review is necessary in order to award fees related to these entries.

33. One of Sanford Law Firm’s strengths is its array of attorneys with specialized knowledge or particular areas of expertise that can participate in cases where their unique skill sets are appropriately utilized. Not every attorney has to know everything about the FLSA, damages calculations, negotiation strategy, settlement agreements, or other aspects of litigation because every Sanford Law

Firm attorney has access to all of the other Sanford Law Firm attorneys and their collective knowledge. This saves time because individual attorneys can gain knowledge through brief conversations with other attorneys rather than through time-consuming legal research on an issue. Even where legal research is required, the focus of that research can often be narrowed through consultation with other attorneys.

34. Where appropriate, Sanford Law Firm attorneys also delegate work to paralegals, law clerks and staff. The hourly rates charged for Sanford Law Firm's paralegals, law clerks and staff are reasonable. *See e.g., Mathis Kearse Wright v. Sumter County Bd. of Elections & Registration*, 2020 U.S. Dist. LEXIS 259287, *13 (M.D. Ga. Dec. 7, 2020) ("Thus, the Court finds that the requested rate of \$110 per hour for the paralegals is reasonable here."). The work performed by support staff members, in this case, was necessary to the litigation and the time spent on those tasks was reasonable.

35. The total overall billing reflected in the Billing Spreadsheet is \$5,545.50. Although the work reflected in the Billing Spreadsheet was reasonable, a twelve percent (12%) reduction in the total billing amount is sufficient to address any billing that the Court may find to be unnecessary or inefficient. Therefore, the total fee amount requested is \$4,880.04, which accounts for this twelve percent reduction to overall billing.

36. In addition, court costs and recoverable expenses were also incurred in this matter. These costs, totaling \$833.90, are included in the Costs Invoice attached hereto as Exhibit B. The costs and expenses detailed in the Invoice that have been advanced by the Sanford Law Firm on behalf of Plaintiff, and which Plaintiff is contractually obligated to reimburse Sanford Law Firm out of any recovery in this case.

37. The amount of the costs requested is correct. The costs stated were necessarily incurred during the case, the services giving rise to the costs were actually and necessarily performed.

38. In sum, the total amount of fees and costs requested is \$5,713.94.

PURSUANT TO 28 U.S.C. § 1746, I VERIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on this day February 21, 2023.

/s/ Josh Sanford
JOSH SANFORD

Date Billed On	Billed By	Description: Redacted	Rate	Time	Value	Entry #
7/21/2022	Josh Sanford	Examination of IOM: potential case	\$470.00	0.10	\$47.00	1
7/21/2022	Josh Sanford	Conference with AS: potential case	\$470.00	0.10	\$47.00	2
7/21/2022	Josh Sanford	Examination of IOM: new case info	\$470.00	0.10	\$47.00	3
8/1/2022	Staff	Work on Client's file: defendant research	\$90.00	0.40	\$36.00	4
8/1/2022	Staff	Conference with handoff of complaint drafting to LC	\$90.00	0.10	\$9.00	5
8/1/2022	Stacy Gibson	Receive, read and prepare response to email(s) from GM re: complaint	\$290.00	0.10	\$29.00	6
8/2/2022	Staff	Reviewing complaint draft	\$90.00	1.40	\$126.00	7
8/3/2022	Staff	Work on Client's file: edits to initial complaints document	\$90.00	0.70	\$63.00	8
8/3/2022	Courtney Lowery	Editing and revision of Complaint, Summons and CTJ	\$220.00	0.30	\$66.00	9
8/3/2022	Josh Sanford	Examination of IOM: draft lawsuit	\$470.00	0.10	\$47.00	10
8/3/2022	Josh Sanford	Editing and revision of CCS and summons	\$470.00	0.10	\$47.00	11
8/3/2022	Josh Sanford	Editing and revision of complaint	\$470.00	0.10	\$47.00	12
8/4/2022	Courtney Lowery	Editing and revision of initial filings; conference with PW re local counsel	\$220.00	0.20	\$44.00	13
8/5/2022	Patrick Wilson	Email to Local Counsel	\$360.00	0.10	\$36.00	14
8/5/2022	Patrick Wilson	Email to local Counsel	\$360.00	0.10	\$36.00	15
8/5/2022	Patrick Wilson	Receive, read and prepare response to email(s) from Local COounsel	\$360.00	0.10	\$36.00	16
8/5/2022	Josh Sanford	Preparation and drafting of IOM: case management	\$470.00	0.10	\$47.00	17
8/8/2022	Josh Sanford	Examination of email to OC	\$470.00	0.10	\$47.00	18
8/11/2022	Patrick Wilson	Receipt and review of court notice	\$360.00	0.10	\$36.00	19
8/11/2022	Patrick Wilson	Receipt and review of Email	\$360.00	0.10	\$36.00	20
8/11/2022	Josh Sanford	Examination of clerks notice	\$470.00	0.10	\$47.00	21
8/12/2022	Patrick Wilson	Court Notice	\$360.00	0.10	\$36.00	22
8/12/2022	Paralegal	Preparation and drafting of PHV forms for PW and JS	\$110.00	0.30	\$33.00	23
8/15/2022	Paralegal	Compose electronic communication to local counsel re: filing PHV forms for JS and PW	\$110.00	0.20	\$22.00	24
8/15/2022	Patrick Wilson	Telephone Conference(s) between Attorney and Client	\$360.00	0.30	\$108.00	25
8/15/2022	Paralegal	Compose electronic communication to local counsel re: PHV forms to file	\$110.00	0.10	\$11.00	26
8/15/2022	Josh Sanford	Examination of emails with CO-C	\$470.00	0.10	\$47.00	27
8/17/2022	Paralegal	Compose electronic communication to Joseph Debiase re: PRIVILEGED INFORMATION	\$110.00	0.10	\$11.00	28
8/17/2022	Josh Sanford	Examination of CO-C emails	\$470.00	0.10	\$47.00	29
8/24/2022	Paralegal	Compose electronic communication to local counsel re: PHV filing	\$110.00	0.10	\$11.00	30
8/24/2022	Stacy Gibson	Conference regarding case deadlines	\$290.00	0.10	\$29.00	31
8/24/2022	Paralegal	Conference regarding case deadlines	\$110.00	0.10	\$11.00	32
8/24/2022	Patrick Wilson	Conference regarding case deadlines	\$360.00	0.10	\$36.00	33
8/24/2022	Josh Sanford	Examination of email to CO-C	\$470.00	0.10	\$47.00	34
8/25/2022	Paralegal	Receive, read and prepare response to email(s) from JS re: PHV applications	\$110.00	0.10	\$11.00	35
8/25/2022	Paralegal	Telephone Conference(s) with local counsel re: filing PHV forms	\$110.00	0.10	\$11.00	36
8/25/2022	Stacy Gibson	Conference with ZB re: PHV deadline	\$290.00	0.10	\$29.00	37
8/25/2022	Paralegal	Telephone Conference(s) with Matt. Herrington re: filing of PHV applications	\$110.00	0.10	\$11.00	38

8/25/2022	Paralegal	Conference with JS re: filing of PHV applications	\$110.00	0.10	\$11.00	39
8/25/2022	Paralegal	Compose electronic communication to JS re: PHV filing applications	\$110.00	0.20	\$22.00	40
8/25/2022	Stacy Gibson	Receive, read and prepare response to email(s) from ZB re: PHV update	\$290.00	0.10	\$29.00	41
8/25/2022	Josh Sanford	Conference with ZB: PHV status	\$470.00	0.10	\$47.00	42
8/26/2022	Paralegal	Receive, read and prepare response to email(s) from local counsel re: PHV applications	\$110.00	0.10	\$11.00	43
8/26/2022	Paralegal	Compose electronic communication to MKS re: request for cert. of good standing	\$110.00	0.10	\$11.00	44
8/26/2022	Paralegal	Conference with BS re: cert. of good standing	\$110.00	0.10	\$11.00	45
8/26/2022	Paralegal	Receive, read and prepare response to email(s) from local counsel re: filing of PHV applications	\$110.00	0.10	\$11.00	46
8/26/2022	Paralegal	Editing and revision of PHV forms	\$110.00	0.10	\$11.00	47
8/26/2022	Paralegal	Receive, read and prepare response to email(s) from local counsel re: filing of PHV applications	\$110.00	0.10	\$11.00	48
8/26/2022	Josh Sanford	Examination of emails with CO-C	\$470.00	0.25	\$117.50	49
8/26/2022	Josh Sanford	Examination of emails with CO-C	\$470.00	0.10	\$47.00	50
8/26/2022	Josh Sanford	Examination of clerks notice, order	\$470.00	0.10	\$47.00	51
9/7/2022	Paralegal	Receive, read and prepare response to email(s) from TF re: service of defendants	\$110.00	0.10	\$11.00	52
9/15/2022	Patrick Wilson	Compose electronic communication to Client	\$360.00	0.10	\$36.00	53
9/15/2022	Patrick Wilson	Telephone Conference(s) between Attorney and Client	\$360.00	0.10	\$36.00	54
9/16/2022	Patrick Wilson	Receipt and review of notice	\$360.00	0.10	\$36.00	55
9/16/2022	Patrick Wilson	Receipt and review of Notice	\$360.00	0.10	\$36.00	56
9/16/2022	Josh Sanford	Examination of notice of issued summons	\$470.00	0.10	\$47.00	57
10/10/2022	Patrick Wilson	Examination of Intra-office memo regarding case events and deadlines	\$360.00	0.10	\$36.00	58
10/19/2022	Stacy Gibson	Conference regarding case status/strategy	\$290.00	0.10	\$29.00	59
10/19/2022	Patrick Wilson	Conference regarding case status/strategy	\$360.00	0.10	\$36.00	60
10/19/2022	Paralegal	Conference regarding case status/strategy	\$110.00	0.10	\$11.00	61
10/27/2022	Patrick Wilson	Compose electronic communication	\$360.00	0.10	\$36.00	62
10/27/2022	Patrick Wilson	Receipt and review of Email	\$360.00	0.10	\$36.00	63
10/31/2022	Patrick Wilson	Receipt and review of emails	\$360.00	0.10	\$36.00	64
10/31/2022	Josh Sanford	Receive, read and prepare response to email(s) from OC	\$470.00	0.10	\$47.00	65
11/1/2022	Patrick Wilson	Receipt and review of email	\$360.00	0.10	\$36.00	66
11/1/2022	Josh Sanford	Examination of OC email	\$470.00	0.10	\$47.00	67
11/1/2022	Josh Sanford	Examination of IOM re client call	\$470.00	0.10	\$47.00	68
11/1/2022	Josh Sanford	Examination of OC email	\$470.00	0.10	\$47.00	69
11/1/2022	Josh Sanford	Receive, read and prepare response to email(s) from OC	\$470.00	0.10	\$47.00	70
11/2/2022	Patrick Wilson	Receipt and review of email	\$360.00	0.10	\$36.00	71
11/2/2022	Patrick Wilson	Receipt and review of notice	\$360.00	0.10	\$36.00	72
11/2/2022	Patrick Wilson	Receipt and review of notice	\$360.00	0.10	\$36.00	73
11/2/2022	Patrick Wilson	Receipt and review of email	\$360.00	0.10	\$36.00	74
11/2/2022	Paralegal	Compose electronic communication to SS re: contacting client	\$110.00	0.10	\$11.00	75
11/3/2022	Patrick Wilson	Receipt and review of email	\$360.00	0.10	\$36.00	76
11/3/2022	Josh Sanford	Receive, read and prepare response to email(s) from OC	\$470.00	0.10	\$47.00	77

11/4/2022	Patrick Wilson	Receipt and review of email	\$360.00	0.10	\$36.00	78
11/4/2022	Patrick Wilson	Receipt and review of email	\$360.00	0.10	\$36.00	79
11/4/2022	Josh Sanford	Telephone Conference(s) with OC	\$470.00	0.20	\$94.00	80
11/9/2022	Josh Sanford	Telephone Conference(s) between Attorney and Client (voicemail)	\$470.00	0.10	\$47.00	81
11/14/2022	Paralegal	Telephone Conference(s) with client re: PRIVILEGED INFORMATION	\$110.00	0.10	\$11.00	82
11/14/2022	Patrick Wilson	Receipt and review of MTW	\$360.00	0.10	\$36.00	83
11/14/2022	Paralegal	Compose electronic communication to OC re: settlement demand	\$110.00	0.20	\$22.00	84
11/14/2022	Josh Sanford	Telephone Conference(s) between Attorney and Client - left voicemail; spoke with client; email to OC	\$470.00	0.20	\$94.00	85
11/14/2022	Josh Sanford	Compose electronic communication - OC	\$470.00	0.10	\$47.00	86
11/14/2022	Josh Sanford	Examination of email to OC	\$470.00	0.10	\$47.00	87
11/18/2022	Paralegal	Editing and revision of motion to substitute	\$110.00	0.10	\$11.00	88
11/21/2022	Josh Sanford	Compose electronic communication - OC	\$470.00	0.10	\$47.00	89
11/22/2022	Josh Sanford	Compose electronic communication - OC	\$470.00	0.10	\$47.00	90
11/22/2022	Josh Sanford	Compose electronic communication - OC; after phone call	\$470.00	0.10	\$47.00	91
12/1/2022	Stacy Gibson	Preparation and drafting of notice of withdrawal and IOM re: the same	\$290.00	0.20	\$58.00	92
12/1/2022	Josh Sanford	Examination of IOM re case management	\$470.00	0.10	\$47.00	93
12/5/2022	Josh Sanford	Receive, read and prepare response to email(s) from OC	\$470.00	0.10	\$47.00	94
12/5/2022	Josh Sanford	Examination of Order	\$470.00	0.10	\$47.00	95
12/6/2022	Paralegal	Examination of docket sheet for pleadings filed under seal	\$110.00	0.10	\$11.00	96
12/6/2022	Stacy Gibson	Conference regarding case status/next steps	\$290.00	0.10	\$29.00	97
12/6/2022	Josh Sanford	Conference regarding case status/next steps	\$470.00	0.10	\$47.00	98
12/6/2022	Paralegal	Conference regarding case status/next steps	\$110.00	0.10	\$11.00	99
12/7/2022	Paralegal	Conference with SG/ZB re MTW	\$110.00	0.10	\$11.00	100
12/7/2022	Stacy Gibson	Compose electronic communications to paralegals re: notice of withdrawal	\$290.00	0.20	\$58.00	101
12/7/2022	Stacy Gibson	Compose electronic communications to paralegals re: notice of withdrawal	\$290.00	0.20	\$58.00	102
12/9/2022	Paralegal	Editing and revision of notice of withdrawal for PW	\$110.00	0.30	\$33.00	103
12/9/2022	Stacy Gibson	Editing and revision of notice of withdrawal	\$290.00	0.10	\$29.00	104
12/12/2022	Paralegal	Receive, read and prepare response to email(s) from SG re: edits to notice of withdrawal	\$110.00	0.10	\$11.00	105
12/12/2022	Stacy Gibson	Receive, read and prepare response to email(s) from ZB re: MTW	\$290.00	0.10	\$29.00	106
12/12/2022	Paralegal	Compose electronic communication to local counsel re: notice of withdrawal	\$110.00	0.20	\$22.00	107
12/13/2022	Paralegal	Conference with SG/ZB re MTW-PW	\$110.00	0.10	\$11.00	108
12/13/2022	Paralegal	Receive, read and prepare response to email(s) from MCP re: notice of withdrawal	\$110.00	0.10	\$11.00	109
12/13/2022	Paralegal	Editing and revision of notice of withdrawal for PW	\$110.00	0.10	\$11.00	110
12/13/2022	Stacy Gibson	Receive, read and prepare response to email(s) from MCP and ZB re: notice of withdrawal	\$290.00	0.10	\$29.00	111

12/13/2022	Stacy Gibson	Receive, read and prepare response to email(s) from local counsel re: notice of withdrawal	\$290.00	0.10	\$29.00	112
1/4/2023	Paralegal	Telephone Conference(s) with Defendant re: contacting JS about case	\$110.00	0.10	\$11.00	113
1/4/2023	Paralegal	Compose electronic communication to JS re: contacting Defendant	\$110.00	0.10	\$11.00	114
1/6/2023	Paralegal	Work on Client's file: update contact info for Defendant and make case status update	\$110.00	0.20	\$22.00	115
1/9/2023	Paralegal	Telephone Conference(s) with client re: case status update	\$110.00	0.10	\$11.00	116
1/9/2023	Josh Sanford	Discussion of case status and directing case strategy to Attorney ZB	\$470.00	0.10	\$47.00	117
1/17/2023	Paralegal	Telephone Conference(s) with Defendant re: email address	\$110.00	0.10	\$11.00	118
1/17/2023	Josh Sanford	Telephone Conference(s) between Attorney and Client	\$470.00	0.10	\$47.00	119
1/17/2023	Josh Sanford	Preparation and drafting of IOM re contact with OC	\$470.00	0.10	\$47.00	120
1/17/2023	Josh Sanford	Examination of IOM re contact with Defendant	\$470.00	0.10	\$47.00	121
1/24/2023	Paralegal	Conference with JS/ZB re case strategy	\$110.00	0.20	\$22.00	122
1/24/2023	Paralegal	Conference with JS and MCP re: case management strategies	\$110.00	0.20	\$22.00	123
1/24/2023	Josh Sanford	Telephone Conference(s) with Defendant (left voicemail)	\$470.00	0.10	\$47.00	124
1/24/2023	Josh Sanford	Conference with MCP and ZB	\$470.00	0.10	\$47.00	125
1/24/2023	Josh Sanford	Examination of Order	\$470.00	0.10	\$47.00	126
1/24/2023	Josh Sanford	Conference with ZB re next steps	\$470.00	0.10	\$47.00	127
1/24/2023	Josh Sanford	Receive, read and prepare response to email(s) from Co-Counsel	\$470.00	0.10	\$47.00	128
1/25/2023	Paralegal	Preparation and drafting of response to order to show cause	\$110.00	0.70	\$77.00	129
1/25/2023	Paralegal	Draft Motion for clerk's entry for default	\$110.00	0.10	\$11.00	130
1/25/2023	Josh Sanford	Telephone Conference(s) between Attorney and Client	\$470.00	0.10	\$47.00	131
1/26/2023	Paralegal	Receipt and review of filed pleadings	\$110.00	0.20	\$22.00	132
1/26/2023	Paralegal	Draft Motion for entry of default judgement	\$110.00	0.70	\$77.00	133
1/27/2023	Paralegal	Receive, read and prepare response to email(s) from JH re: damages calculations for client	\$110.00	0.20	\$22.00	134
1/27/2023	Paralegal	Editing and revision of declaration of josh sanford	\$110.00	0.20	\$22.00	135
1/27/2023	Paralegal	Compose electronic communication to JS re: review of motion for entry of default judgment	\$110.00	0.10	\$11.00	136
1/30/2023	Paralegal	Receive, read and prepare response to email(s) from JS re: declaration for default judgment	\$110.00	0.10	\$11.00	137
1/30/2023	Paralegal	Editing and revision of clerk's entry for default and declaration	\$110.00	0.10	\$11.00	138
1/30/2023	Paralegal	Editing and revision of motion for entry for default and response to order to show cause	\$110.00	0.30	\$33.00	139
1/30/2023	Paralegal	Compose electronic communication to local counsel re: review of motion and response to order	\$110.00	0.10	\$11.00	140
1/30/2023	Paralegal	Filing of motion for clerk's entry for default	\$110.00	0.30	\$33.00	141

1/31/2023	Paralegal	Compose electronic communication to JS re: filed pleadings to be sent to Defendant	\$110.00	0.10	\$11.00	142
1/31/2023	Paralegal	Receive, read and prepare response to email(s) from JS re: drafting of motion for default judgment	\$110.00	0.10	\$11.00	143
2/13/2023	Paralegal	Compose electronic communication to SG re: drafting motion for default judgment	\$110.00	0.10	\$11.00	144
2/13/2023	Stacy Gibson	Compose electronic communication to VK re: fee declaration	\$290.00	0.10	\$29.00	145
2/13/2023	Stacy Gibson	Compose electronic communication to law clerk re: motion for default judgment	\$290.00	0.10	\$29.00	146
2/14/2023	Vanessa Kinney	Work on Client's file: download and format billing spreadsheet and costs invoice	\$360.00	0.30	\$108.00	147
2/14/2023	Vanessa Kinney	Work on Client's file: sanford declaration and conduct privilege check of billing entries	\$360.00	1.00	\$360.00	148
				22.25	\$5,545.50	

Matter Expense Report

Date	Description	Amount
1/26/2023	Docket Report and download of filed pleadings	\$1.80
12/6/2022	Docket Report	\$0.30
11/14/2022	Service Fee to ABC Legal Services	\$212.00
10/14/2022	TLO Business Search Fee	\$17.80
9/2/2022	PHV Fees Paid to DCBF Legal	\$200.00
8/10/2022	Filing Fee Paid to DeLong Caldwell Bridgers Fitzpatrick and Benjamin	\$402.00
Total		\$833.90